

KEVIN G. HORBATIUK (KGH-4977)  
RUSSO, KEANE & TONER, LLP  
Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO., INC.**  
26 Broadway - 28th Floor  
New York, New York 10004  
(212) 482-0001

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
**IN RE COMBINED WORLD TRADE CENTER  
AND LOWER MANHATTAN DISASTER SITE  
LITIGATION,**

**21 MC 102 (AKH)**

-----X  
**WILSON SANCHEZ,**

**DOCKET NO.:  
07 CV 05386**

**Plaintiff,**

**-against-**

**100 CHURCH, LLC, 222 BROADWAY, LLC  
25 BROADWAY OFFICE PROPERTIES, LLC  
63 WALL STREET, INC., 63 WALL, INC., 90  
CHURCH STREET LIMITED PARTNERSHIP,  
ACT A REALTY, CORP., ALAN KASMAN DBA  
KASCO, AMBIENT GROUP, INC., BATTERY PARK  
CITY AUTHORITY, BELFOR USA GROUP, INC.,  
BFP ONE LIBERTY PLAZA CO., LLC BLACKMON-  
MOORING STEAMATIC CATASTROPHE,  
INC., d/b/a BMS CAT, BOARD OF EDUCATION OF  
THE CITY OF NEW YORK, BOARD OF MANAGERS  
OF HUDSON VIEW EAST CONDOMINIUM,  
BOSTON PROPERTIES, INC., BROOKFIELD  
FINANCIAL PROPERTIES, INC., BROOKFIELD  
FINANCIAL PROPERTIES, L.C., BROOKFIELD  
PARTNERS, L.P., BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS, INC., BROWN BROTHERS HARRIMAN  
& CO., INC., CHASE MANHATTAN BANK  
CORPORATION, CUNNINGHAM DUCT CLEANING CO.,  
CUSHMAN & WAKEFIELD, INC., DEPARTMENT OF**

**NOTICE OF  
ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT**

BUSINESS SERVICES, ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWER ASSOCIATES, INC., INDOOR AIR PROFESSIONALS, INC., INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASKO RESTORATION SERVICES CO., LAW ENGINEERING, P.C., MERILL LYNCH & CO., INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC NEW LIBERTY PLAZA, LP., NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY, NEW YORK UNIVERSITY, ONE LIBERTY PLAZA, R Y MANAGEMENT CO., INC., RELATED BPC ASSOCIATES, INC., RELATED MANAGEMENT CO., LP., ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC RY MANAGEMENT, SABINE ZERARKA, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., SWISS BANK CORPORATION, THAMES REALTY CO., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO # 1178), THEONE LIBERTY PLAZA CONDOMINIUM (CONDO # 1178), THE RELATED COMPANIES, L.P., THE RELATED REALTY GROUP, INC., TRC ENGINEERS, INC., TRIBECA LANDING LLC, VERIZON NEW YORK, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA CO., G.P., CORP., WFP TOWER D CO., G.P., CORP., WFP TOWER D HOLDING CO., I. LP., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLD I. G.P., CORP., WFPT TOWER D CO., L.P., WORLD FINANCIAL PROPERTIES, L.P., and ZAR REALTY MANAGEMENT CORP., et al .

Defendants.

-x

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO,

KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
January 9, 2008

Kevin G. Horbatiuk  
Kevin G. Horbatiuk (KGH4977)  
Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO.,**  
**INC.**  
RUSSO, KEANE & TONER, LLP  
26 Broadway, 28th Floor  
New York, New York 10004  
(212) 482-0001  
RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Attorney for Plaintiff  
**WILSON SANCHEZ**  
115 Broadway 12th Floor  
New York, New York 10006  
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 9th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Attorney for Plaintiff  
WILSON SANCHEZ  
115 Broadway 12th Floor  
New York, New York 10006

A handwritten signature in black ink, reading "Kevin G. Horbatiuk", written over a horizontal line.

KEVIN G. HORBATIUK